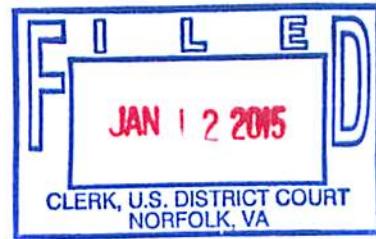


United States District Court
Eastern District of Virginia



Emma L. Floyd-Sharp
Plaintiff,

-against-

Compliant 2:15-cv-1

Armor Correctional Health Services, Inc.
Defendant

1. At all times hereinafter mentioned, plaintiff was and still is a resident of the city of Portsmouth at 1410 Loren Crescent 23701 in the state of Virginia.
2. Defendant, Armor Correctional Health Services, Inc. is a corporation incorporated under the laws of the State of Florida and having an office at 4960 S.W. – 72nd Street, Suite 400, Miami FL 33155, and is licensed to do business in the state of Virginia.
3. The jurisdiction of this court is invoked pursuant to the Title VII of the Civil Rights Act of 1964 and the Virginia Human Rights Act, VA Code 2.2-3900B et seq.
4. I had been employed with Corizon Health Services, Inc. since June 2013 as the Health Services Administrator, as a contract employee, and was assigned to work at Deerfield Correctional Center, Capron, VA, which is a facility operated by the Dept. of Corrections. Corizon gave up the contract with DOC and the contract was awarded to Armor Correctional Health Services, Inc. On August 14, 2014 I was interviewed by "Armor" employees, Dwayne Phillips- Regional Vice-President, James Hatcher, Senior Vice-President, and Linda Owens, Regional Vice-President, for the Health Services Administrator for Deerfield Correctional. On August 27, 2014 @ 9pm I was advised by James Hatcher and Linda Owens I was not selected for the position. During our phone conversation, I question the reasons I was not selected and Linda Owens replied that it was client wishes, my job performance, my interview, and that you are not a "fit" for Deerfield. During the same conversation I was offered another position with "Armor", a quality controller and that the salary would be lower since it is not a supervisor job and if my job performance improved if a Health Services Administrator position came open I could apply if my job performance improved. I was made aware about two weeks later the position was offered to what I believe is a less qualified candidate.

On August 28, 2014 still confused about "Armor's" decision since Corizon's executive team hadn't express anything to me and I had just received a favorable evaluation with a rate increase, I wrote a letter to Linda Owens asking her to further details her remarks since she hadn't ask me any of those questions during my interview, as of today I have not received a reply from her. I contacted Beth Cabell, Asst. Warden at Deerfield Correctional, seeking a answer to her concerns, since Ms Owens had said it was client wishes. Ms Cabell had no real answers or concerns, but to finally say she would tell me exactly what she said. Ms Cabell went on to say that it's like this: if DOC came in here and the facility was dirty they would reprimand me and transfer me somewhere else. I further expressed to her that if there any problems or concerns she had not expressed those to me or my supervisors, she had no answers for my concern. She finally said that "Corizon hadn't been fair to me". On September 08, 2014 still seeking resolution of the statement made by Ms Owens I contacted Creon Rawls, VP Human Resources of Armor, by letter and phone, but as of today I have not received a reply.

I left my position as the Health Site Administrator and as an employee of Corizon on September 30, 2014 after the contract ended. I continued to feel that this whole situation was brought on by retaliation. I had an LPN staff nurse, Karen Younce that was on my staff who became dissatisfied because she felt her training didn't have to be dual but only to the infirmary. Ms Younce left the facility after making allegations that I was a racist, unfair, and should be fired by Corizon. Her main concern was that I had discussed with her all of her concerns that she had since I became the "HSA" including the one that she was overheard saying by staff members that if Deerfield had a black "HSA" there would be problems. The situation was investigated by Corizon and the Dept. of Corrections and the findings were that I had done nothing wrong. Karen Younce is a personal friend to Ms Cabell, the Asst Warden at Deerfield Correctional and to Linda Owens, VP of Armor. Ms Younce's husband also works at DOC and during this investigation called the executive team of Corizon and insisted that I be fired. Robert Younce, during a meeting of DOC, unaware that there were Corizon employees around said that as soon as "Armor" takes over Ms Floyd, Sharp or whatever she call herself will not be there. I had to face my staff, the officers and staff of the facility after not being hired by the new company, knowing that I was the only one in 13 sites to lose their job. There were no complaints about my job performance from Corizon, DOC or the staff at the facility. I faced comments by fellow staff members such as "I told you these white folks were going to run you away, what you are going to do now", and "Ms Cabell up to her same old prejudice ways".

October 01, 2014 I made a compliant with EEOC and findings allowed me to bring on this law suit based on the findings that "Armor" based their decision on job performance but didn't do that for all the candidates.

5. WHEREFORE, plaintiff demands:

- a. Money damages in the amount to be determined by the court based on lost wages.
- b. Permanent injunction against the defendant from telling other potential employers that the reason I was not retained is job performance.

c. Any further relief which the court may deem appropriate.

Mary J. McShay
1410 Loren Crescent
Portsmouth, VA 23701
757-488-7799

Date 12/26/2014